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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

12 JONATHAN DEAN IVAN MUÑOZ,) Case No.: 1:23-cv-00385-BAM
13 Plaintiff,) STIPULATION AND [PROPOSED] ORDER
14 vs.) FOR AN EXTENSION OF TIME
15 KILOLO KIJAKAZI,)
Acting Commissioner of Social Security,)
16)
17 Defendant.)
18)

19 Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the
20 parties, through their respective counsel of record, that the time for Defendant to respond to
21 Plaintiff's Motion for Summary Judgment be extended fifteen (15) days from July 31, 2023, up
22 to and including August 15, 2023. This is the Defendant's first request for an extension.

23 Defendant requests this extension in order to review the record; evaluate the issues raised
24 in Plaintiff's brief; determine whether options exist for settlement; and if not, to prepare
25 Defendant's response to Plaintiff's motion. Defendant's counsel was recently assigned this case
26 along with several other cases due in the next few weeks, and now has ten cases due in a nine-
27 day period. Defendant's counsel will endeavor to complete these tasks as soon as possible. This
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1 request is made in good faith and with no intention to unduly delay the proceedings, and counsel
2 apologizes for any inconvenience.

3 The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.

5 Respectfully submitted,

6 Dated: July 17, 2023

/s/ *Francesco Benavides**
(*as authorized via e-mail)
FRANCESCO BENAVIDES,
Attorney for Plaintiff

9 Dated: July 17, 2023

10 PHILLIP A. TALBERT
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11 MATHEW W. PILE
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13 By: /s/ *Michelle A. Pavelek*
14 MICHELLE A. PAVELEK
Special Assistant U.S. Attorney
15 Attorneys for Defendant

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17 **ORDER**

18 Pursuant to the parties' stipulation and good cause appearing, IT IS SO ORDERED that
19 Defendant shall have a fifteen-day extension and shall respond to Plaintiff's Motion for
20 Summary Judgment on or before August 15, 2023.
21 IT IS SO ORDERED.

22 Dated: July 18, 2023

/s/ *Barbara A. McAuliffe*

23 UNITED STATES MAGISTRATE JUDGE